

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MAURICE C. WOOD : CIVIL ACTION

v. :

FRANK D. GILLIS, et al. : NO. 02-4523

ORDER

AND NOW, this day of , 2006,
respondents' time for filing a supplemental response to the petition for writ of
habeas corpus is extended to July 24, 2006.

BY THE COURT:

JACOB P. HART
UNITED STATES MAGISTRATE JUDGE

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MAURICE C. WOOD : CIVIL ACTION

v. :

FRANK D. GILLIS, et al. : NO. 02-4523

MOTION FOR *NUNC PRO TUNC* ENLARGEMENT OF TIME TO FILE
SUPPLEMENTAL RESPONSE
TO PETITION FOR WRIT OF HABEAS CORPUS

LYNNE ABRAHAM, District Attorney of Philadelphia County, by
ROBERT M. FALIN, Assistant District Attorney, on behalf of respondents,
respectfully requests an enlargement of time within which to file a response to
the petition for writ of habeas corpus in the above-captioned matter. In support
thereof, respondents submit the following:

1. A response in the above-captioned habeas matter was due on June 8, 2006, pursuant to an order filed by this Court on May 19, 2006. This order was sent by United States Mail to respondents (thus adding three days to the 20 stated in the order). And, because the deadline fell on a Sunday, the due date became June 12.

2. Unfortunately, undersigned counsel finds it necessary to seek an extension of this deadline in order that he might provide the Court with a complete and helpful response.

3. For a number of reasons, undersigned counsel has not yet completed a response in the above-captioned habeas matter.


4. Several other habeas cases have occupied counsel's time, including but not limited to, objections to a report and recommendation in Jaynes v. Grace, No. 05-2567 (E.D.Pa.); and a response brief in the capital case of Lambert v. Beard, No. 02-9034 (E.D.Pa.).

5. In addition, undersigned counsel is getting married June 17th, and will therefore be out of the office until July. Moreover, when he returns, he has less than three weeks to finish his brief in Lambert, supra, which is under a final extension. In that case, he is responding to nearly three-hundred pages of briefing, filed by the Federal Capital Defenders.

6. Undersigned counsel apologizes to this Court for the tardiness of this request.

WHEREFORE, respondents respectfully request that they be given an additional forty-five days, until July 29, 2006, to file a response.

Respectfully submitted,


ROBERT M. FALIN
Assistant District Attorney

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CERTIFICATE OF SERVICE

I, ROBERT M. FALIN, herby certify that on June 14, 2006, a copy of the foregoing pleading was served by placing same, first-class postage prepaid, in the United States Mail, addressed to:

MAURICE WOOD
CN-3835
1 KELLEY DRIVE
COAL TOWNSHIP, PA 17866

A handwritten signature in black ink, appearing to read 'R. Falin', with a long horizontal flourish extending to the right.

ROBERT M. FALIN
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